

<b>COD</b>	
Inventory	<p>Tab 1 - PO should be "FSA"</p> <ul style="list-style-type: none"> <li>- Include Rosemary's phone number</li> </ul> <p>Tab 3 - Why was Availability changed from Medium to High?</p>
Self Assessment	<p>Tab 1- Not completed. Please fill out.</p> <p>Tab 2 - Take out notes to Don and give completed answers</p> <p>Tab 3 - Please change the following -</p> <ul style="list-style-type: none"> <li>- Make sure each answered question has the initials of the person who answered it in column M</li> <li>- According to the SA training guidance, you cannot implement a security control if you do not have procedures. Please delete any "Y" responses in the implementation column where you do not have supporting procedures. You will not get "credit" for these responses.</li> <li>- During the training we were instructed not to put anything in the Integrated column. No agency is that far along. Please remove the Y answers from the Integrated column.</li> <li>- For your final draft, please eliminate the color scheme in the implementation column.</li> </ul>
<b>CPS</b>	
CIP	Tab 3 - Missing responses for questions 1-17
Inventory	<p>What changes were made to require a new inventory?</p> <p>Tab 1 - System name should be CPS</p> <ul style="list-style-type: none"> <li>- Resource owner should be the System Owner, including their phone number</li> <li>- Resource manager should be the System Manager, including their phone number</li> </ul> <p>Tab 2 - Why the reference to SAIG in Column B?</p> <ul style="list-style-type: none"> <li>- See the example in the attached note for the desired format for the system description.</li> </ul> <p>Tab 3/4 - Why did you refer to the inventory form as the justification for the sensitivity and criticality ratings in this inventory form?</p>
<b>CRM4FSA</b>	
CIP	CIP provided was actually for Students Portal. Please provide CIP for CRM4FSA.
Inventory	No explanations were provided for anything. Provide information requested in Tabs 2, 3, 4, and 5.
<b>DCSS</b>	
CIP	<p>Tab 2 - Organization should be "FSA"</p> <ul style="list-style-type: none"> <li>- Asset name should be DCSS. Also, FFEL should be replaced with DCSS throughout this page and Tab 3.</li> </ul>

Inventory	<p>What changes were made to require a new inventory form?</p> <p>Tab 1 - CSO is Andy Boots.</p> <p>- System name should be DCSS. Also, FFEL/DMCS should be replaced with DCSS throughout this page and the rest of the inventory.</p> <p>Tab 2 - See the example in the attached note for the desired format for the system description.</p> <p>- Provide specific data used by the system.</p> <p>Tab 3/4 - Sensitivity was never to be determined after review of the risk assessments. Criticality will be updated from the results of the CIP, but the initial estimate and justification should still be provided. The last risk assessment should have guidance as to the sensitivity and criticality ratings and their justification.</p> <p>Tab 5 - List all the different systems DCSS interconnects with.</p>
Self-Assessment	<p>Tab 1- Not completed. Please fill out.</p> <p>Tab 2 - Need responses for 2002, not just 2001. Please thoroughly complete Tab 2.</p> <p>Tab 3 - Please change the following -</p> <p>- Make sure each answered question has the initials of the person who answered it in column M</p> <p>- Was the entire form completed? It appears as though the responses trailed off towards the end. Please address every element.</p> <p>- Please use the prepopulated responses from Andy for the Policy column and for some of the Procedure column. This will make your overall score better.</p> <p>- During the training we were instructed not to put anything in the Integrated column. No agency is that far along. Please remove the Y answers from the Integrated column.</p>
<b>DLCS</b>	
CIP	Looks terrific - great job providing justifications even for items rated "1" or "2".
Inventory	<p>Tab 1 - PO should be FSA, not Office of Postsecondary Education</p> <p>Tab 3 - Why was Availability changed from Medium to High?</p>
<b>DLOS</b>	
CIP	Tab 2 - Organization should be FSA. Otherwise, looks good.
Inventory	<p>Tab 1 - PO should be "FSA"</p> <p>- CSO is Andy Boots</p> <p>- Include Rosemary's phone number</p> <p>Tab 3 - Why was Availability changed from Medium to High?</p>
<b>DLSS</b>	
CIP	Looked fine
Inventory	What changed to require a new inventory?
Self-Assessment	<p>Tab 2 not answered - please complete all Tab 2 questions.</p> <p>Tab 3 - - It looks like the Self Assessment work stopped at question 58. Please complete the rest of the form and resubmit by the end of today.</p>

<b>eCB</b>	
CIP	Question #68 asks if the system will ensure compliance, not if it is compliant.
Inventory	What changes were made from the previous inventory? - If changes are necessary, use the Excel version for the update
Self-Assessment	Tab 1 - The Computer Security Officer is Andy Boots, not Richard Bennett. Richard Bennett is the System Security Officer. Please change. Tab 2 incomplete - please answer questions 14 through 19 Tab 3 - Make sure each answered question has the initials of the person who answered it in column M  Your assessment looks good. Almost too good. If called upon, be sure you can justify every one of your responses.
<b>ERM</b>	
CIP	For a system with a criticality rating of "Important", it doesn't make sense that the system at most only minimally impacts these different criteria. Why bother having the system?
Inventory	What changes were made to require a new inventory form? Tab 1 - PO should be "FSA" Tab 2 - Check the example to see the required format and information. - Missing system data, hardware and hardware location, and software and software location Tab 3 - Break up explanations for confidentiality, integrity and availability to separate cells. Tab 5 - Are there any other systems that interconnect with ERM other than EDnet?
Remediation Plan	See edits on actual plan
Self Assessment	From previous comments: Tab 1 - The Principle office is FSA, not CFO. Please change.  Tab 3 - - During the training we were instructed not to put anything in the Integrated column. No agency is that far along. Please remove the Y answers from the Integrated column. - According to the SA training guidance, you cannot implement a security control if you do not have procedures. Please delete any "Y" responses in the implementation column where you do not have supporting procedures. You will not get "credit" for these responses.
<b>ez-Audit</b>	
Inventory	Tab 1 - Organization should be FSA  Tab 2 - Use the sample provided in the attached note to see the required format. Be sure to include the system's data, hardware and hardware locations, and software and software locations. If the hardware and software is still TBD, state as much.
Self-Assessment	Tab 1 - Not completed - Please complete Tab 1
<b>FMS</b>	
CIP	Tab 2 - Organization should be FSA

Self Assessment	<p>Tab 1 - Not completed. Please fill out.</p> <p>Tab 2 - Not completed. Please fill out.</p> <p>Tab 3 - Please change the following -</p> <ul style="list-style-type: none"> <li>- Some of the N/A responses are confusing as to why they do not apply to N/A. It may be helpful to explain why the security control element does not reply in the comments column</li> <li>- During the training we were instructed not to put anything in the Integrated column. No agency is that far along. Please remove the Y answers from the Integrated column.</li> </ul> <p>Your assessment looks good. Almost too good. If called upon, be sure you can justify every one of your responses.</p>
<b>FSA Net</b>	
CIP	Tab 3 - All entries are zero. Is this system not applicable to <u>any</u> Departmental goal?
Inventory	<p>Tab 2 - See the example in the attached note for the desired format for the system description.</p> <ul style="list-style-type: none"> <li>- Provide specific data, hardware and software used by the system. If that information is still undecided, state as much.</li> </ul> <p>Tab 3 - Confidentiality - If there is no sensitive data on this system, this should be rated "Low".</p> <ul style="list-style-type: none"> <li>- Integrity - Would this actually be a "Medium"? If the information is readily available elsewhere and there would be no major consequences caused by data corruption/changes, this should be rated as "Low".</li> <li>- Availability - If there is no availability requirements for this system, it should be rated "Low".</li> </ul>
<b>HR</b>	
CIP	Tab 3 - Almost all entries are zero. Although this is an internal application, wouldn't its loss at least minimally impact processes by affecting FSA employees abilities to do their jobs?
Inventory	<p>Tab 2 - See the example in the attached note for the desired format for the system description.</p> <p>Provide specific data, hardware and software used by the system.</p>

Remediation Plan	<p>Identified Risks - Use recommendations listed in the RA's conclusion. Current list of identified risks in the remediation plan include substantial descriptions of non-risky procedures.</p> <p>Rating - Unfortunately, this risk assessment was completed before the High/Medium/Low convention was established at ED. I'd recommend rating "red light" risks as High, "yellow light" as Medium, and "green light" as Low.</p> <p>Estimated costs - Include how much was already spent in fixing the observations, even if this was from previously allocated money or was completed using FSA resources (if using FSA resources, estimate cost of FTEs expended). Note that this money was already allocated.</p> <p>Due dates - Make sure completion dates are provided for every action. If already completed, provide when the action was completed.</p> <p>Background checks - The RA recommendation was to complete background checks on "all critical positions at Jamcracker before access to sensitive systems is permitted." Since then, ED has provided more explicit guidance regarding whom most get what types of background checks. Use this guidance (contact Joel Clark for specifics) in order to make your cost estimation and due date.</p>
Self-Assessment	<p>Tab 1 - Please verify that Calvin is both the Resource Owner and Manager. Ideally, different people occupy these positions.</p> <p>Tab 3 - Please address the following:</p> <ul style="list-style-type: none"> <li>- For any risk-based decision, please provide a justification in the comment column.</li> <li>- According to the SA training guidance, you cannot implement a security control if you do not have procedures. Please delete any "Y" responses in the implementation column where you do not have supporting procedures. You will not get "credit" for these responses.</li> </ul>
<b>IFAP</b>	
CIP -	Tab 2 - Organization should be "FSA"
Inventory	<p>What changes were made from the previous inventory?</p> <p>If changes are necessary, use the Excel version for the update.</p>
Self-Assessment	<p>Tab 1 - Which is the correct name for IFAP - "IFAP Web site" or "IFAP." The Department knows the system as IFAP. If you would like to formally change the name, you will need to make sure this is reflected in your Inventory Worksheet</p> <p>Tab 3 - Be prepared to explain why so few security controls are implemented. Your overall score will be lower than most FSA systems.</p>
<b>LMS</b>	
CIP	Looks OK

Inventory	<p>Tab 2 - See the example in the attached note for the desired format for the system description.</p> <p>- Provide specific data, hardware and software used by the system.</p> <p>Tab 3 - Confidentiality - Explanation is very confusing. Does LMS contain Privacy Act data or not? How does it link to other systems that do? In general, talk about LMS, not HR.</p> <p>- Integrity - Again, talk about LMS, not HR. How is integrity important to this system?</p> <p>- Availability - Again, talk about LMS, not HR. Why would open season for benefits affect LMS?</p> <p>Tab 4 - The explanation for criticality suggests Supportive instead of Important.</p>
<b>NSLDS</b>	
CIP	Looks good
Self-Assessment	<p>Tab 3 - Please address the following:</p> <p>- Make sure each answered question has the initials of the person who answered it in column M</p> <p>- In the Policy column, you often write "VDC" because the VDC covers this security control element. The training guidance instructed us to place all comments in the comments column. Please change. Additionally, just because the VDC covers a security control element, doesn't necessarily mean they have policy for it too. FSA has policy for almost every element. Please change.</p>
<b>OCTS</b>	
CIP	Tab 2 - Organization should be "FSA"
Inventory	<p>What changed to require a new inventory?</p> <p>Tab 1 - PO should be "FSA"</p> <p>Tab 5 - Is OCTS not connected to anything else? EDnet, etc.?</p>
Self-Assessment	<p>Tab 3 - Please address the following:</p> <p>- Make sure each answered question has the initials of the person who answered it in column M</p> <p>- During the training we were instructed not to put anything in the Integrated column. No agency is that far along. Please remove the Y answers from the Integrated column.</p>
<b>PELL</b>	
CIP	<p>Tab 2 - Asset name should be PELL, not RFMS</p> <p>- Tab 3 - Question #68 asks if the system ensures compliance, not if it is compliant with Section 508.</p>
Inventory	<p>What changed so as to require a new inventory form?</p> <p>Tab 1 - Asset name should just be "PELL"</p>
Self-Assessment	Minor changes
<b>PEPS</b>	
CIP	Tab 2 - Organization should be "FSA"
Inventory	<p>What changed to require a new inventory form?</p> <p>Tab 1 - Organization should be "FSA"</p>

Self-Assessment	<p>Tab 2 incomplete - please finish</p> <p>Tab 3 - Please address the following:</p> <ul style="list-style-type: none"> <li>- Make sure each answered question has the initials of the person who answered it in column M</li> <li>- In the comments field, where you say "OCIO response needed for this section," if you are implying that the VDC (your GSS) covers these security controls for your system, please state "See VDC Self-Assessment"</li> <li>- Please use the prepopulated responses from Andy for the Policy column and for some of the Procedure column. This will make your overall score better.</li> <li>- During the training we were instructed not to put anything in the Integrated column. No agency is that far along. Please remove the Y answers from the Integrated column.</li> </ul>
<b>PGA</b>	
CIP	Tab 3 - Almost all entries are zero. Although this is an internal application, wouldn't its loss at least minimally impact processes by affecting FSA employees abilities to do their jobs?
Inventory	<p>Tab 2 - See the example in the attached note for the desired format for the system description.</p> <ul style="list-style-type: none"> <li>- Provide specific data, hardware and software used by the system.</li> </ul> <p>Tab 3/4 - Explanation of availability and criticality are contradictory.</p>
<b>SAIG</b>	
CIP	Tab 2 - Organization should be "FSA"
Inventory	<p>What changed requiring the submission of a new inventory form?</p> <p>Tab 2 - Why the reference to CPS in Column B?</p> <ul style="list-style-type: none"> <li>- Why the reference to "See CPS Security Plan, May 2002, Section 1.0 System Identification" in the second paragraph in the Explanation column?</li> <li>- First paragraph in Explanation column should describe SAIG, not talk about the system's sensitivity/criticality (See the example in the attached note for the desired format for the system description).</li> </ul> <p>Tab 4 - Why did you refer to the inventory form as the justification for the criticality ratings in this inventory form?</p> <p>Tab 5 - List all systems interconnected with SAIG.</p>
Self Assessment	<p>Tab 1 - Resource Owner should be Stephen Hawald, not Baha. Resource Manager is Baha, not Hawald.</p> <p>Tab 3 - I would think SAIG has more security controls implemented than the review indicates. Please reconfirm. If SAIG has not implemented the majority of its procedures, ok.</p> <ul style="list-style-type: none"> <li>-The VDC covers certain portions of SAIG's security. This should be indicated in certain sections, such as Physical Environmental Protection.</li> </ul>
<b>Students Portal</b>	
CIP	Question 68 ask about ensuring compliance, not whether the system is compliant.
Inventory	No explanations were provided for anything. Provide information requested in Tabs 2, 3, 4, and 5.

<b>TDP</b>	
<b>CIP</b>	Tab 2 - Organization should be FSA
<b>Inventory</b>	<p>Tab 1 - Organization should be FSA</p> <p>Tab 2 - See the example in the attached note for the desired format for the system description.</p> <ul style="list-style-type: none"> <li>- Provide specific data, hardware and software used by the system. If that information is still undecided, state as much.</li> </ul> <p>Tab 3 - Confidentiality - Include whether the system records SSNs. If it does, the system must be rated "High" for confidentiality.</p> <ul style="list-style-type: none"> <li>- Availability - Please rewrite with the system's requirement for availability. Current wording implies the systems can be down for over five days, meaning "Low" availability rating.</li> </ul>
<b>VDC</b>	
<b>CIP</b>	The format is fine, but the scores (to me) seem very low. Even though the VDC doesn't directly do many of the things called for in the CIP, its disappearance would significantly hamper FSA's ability to complete those tasks.
<b>Self Assessment</b>	<p>Tab1 (we'll make these corrections): Owner=Hawald, Manager=Wilson</p> <p>Tab2 (we'll make these corrections): DOE should be changed to ED and SFA to FSA</p> <p>Tab3: Don't understand why you have risk based = "Y" for items 1-116. Only enter a "Y" in that column if you never plan to implement and test the control; and you have a documented risk based decision not to. Else, leave blank.</p> <p>I believe that your physical and environmental controls have been tested. Are you sure they haven't? Example: #96 for uninterrupted backup power - you test your generators regularly - I think.</p>